

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

MYLAN, INC. <i>et al.</i> ,)	
)	Civil Action No. 15-581
Plaintiffs,)	
)	
v.)	Chief Judge Joy Flowers Conti
)	
KIRKLAND & ELLIS LLP,)	
)	ELECTRONICALLY FILED
Defendant.)	

DEFENDANT’S BRIEF REGARDING SECURITY

Defendant Kirkland & Ellis LLP (“Kirkland”), pursuant to the Court’s June 9, 2015, order (Dkt. 97), hereby submits this brief regarding the posting of security in this case.

For the reasons set forth in Kirkland’s separately filed Objections to Report and Recommendation on Plaintiffs’ Motion for Preliminary Injunction (which are incorporated by reference), Kirkland does not seek the posting of a specific amount of security, if any. Kirkland is no longer advising Teva on this transaction or otherwise supporting Teva’s efforts to acquire Mylan N.V. Kirkland will have no further role in the transaction and has not communicated with—and will not communicate with—Teva’s successor counsel regarding the transaction. Teva’s decision to secure substitute counsel has obviated the need for any injunction. Accordingly, Kirkland leaves the amount of security to the discretion of the trial court, and in light of the foregoing, believes a nominal bond would suffice.

WHEREFORE, Kirkland respectfully asks the Court to enter an order in the proposed form attached.

Respectfully Submitted:

Dated: June 23, 2015

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CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2015, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Richard W. Hosking